IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,)
Plaintiff,	}
-vs-) No. CR-20-240-F
BOBBY CHRIS MAYES,)
Defendant.)

DECLARATION OF JASON WILDEMAN

I, Jason Wildeman, being duly sworn upon my oath, state the following facts:

- 1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been since April 2021. I am currently assigned to the FBI's Oklahoma City Division, where I have been involved in a wide variety of investigative matters, including numerous investigations targeting white collar criminal enterprises, as well as violations pertaining to the unlawful distribution of narcotics, money laundering, corporate and securities fraud, fraud against the government, political corruption, fugitive matters, and other violations.
- 2. As part of the investigation into the disappearance of Courtney Wells, I have requested information, by way of a search warrant, from Google relating to e-mail accounts that were relevant to the post-trial motions filed by Defendant Chris Mayes. That warrant sought e-mails from the e-mail accounts: cmayes11@gmail.com, quartneeee@gmail.com, andy@bigredsports.com, chris@bigredsports.com and courtney@bigredsports.com. I

GOVERNMENT EXHIBIT

have reviewed the data returned by Google in response to that warrant and have summarized the findings from those business records below. This is not a complete representation of the records provided by Google and only contains a summary of some of the records considered relevant in relation to the defendant's motion (Doc. 227-3). Because Google provided the hosting services for the domain bigredsports.com, Google also had custody of information relating to those accounts in addition to the g-mail accounts in question.

- 3. The warrant requested information relating to the time frames associated with the ten specific e-mails attached to the defendants' motion (Doc. 227-3). I have reviewed the return of material from that warrant and note the following:
 - a. April 5, 2013 e-mail from andy@bigredsports.com to courtney@bigredsports.com. (Doc. 227-3, p.1). The materials returned by Google did not include any material prior to August of 2017 and therefore no information confirmed the authenticity of this e-mail.
 - b. March 16, 2016 e-mail from quartneeee@gmail.com to andy@bigredsports.com. (Doc. 227-3, p. 2) The materials returned by Google did not include any material prior to August of 2017 and therefore no information confirmed the authenticity of this e-mail.
 - c. March 16, 2016 e-mail from courtney@bigredsports.com to andy@bigredsports.com. (Doc. 227-3, p. 3) The materials returned by Google did not include any material prior to August of 2017 and therefore no information confirmed the authenticity of this e-mail.

- d. August 4, 2017 e-mail from andy@bigredsports.com to courtney@bigredsports.com. (Doc. 227-3, p. 4). The Google materials returned included one e-mail dated on or about August 4, 2017. This particular e-mail was not found among the materials returned.
- e. August 4, 2017 e-mail from courtney@bigredsports.com to andy@bigredsports.com. (Doc. 227-3, p. 5) The Google materials returned included one e-mail dated on or about August 4, 2017. This particular e-mail was not found among the materials returned.
- f. August 31, 2017 e-mail from quartneee@gmail.com to andy@bigredsports.com. (Doc. 227-3, p. 6) The Google materials returned included approximately 20 e-mails dated on or about August 31, 2017. This particular e-mail was not found among the materials returned.
- g. September 3, 2017 e-mail from andy@bigredsports.com to courtney@bigredsports.com (Doc. 227-3, p. 7) The Google materials returned included no e-mails dated on or about September 3, 2017. This particular e-mail was not found among the materials returned.
- h. February 12, 2018 e-mail from courtney@bigredsports.com to andy@bigredsports.com (Doc. 227-3, p. 8) The Google materials returned included no e-mails dated on or about February 12, 2018. This particular e-mail was not found among the materials returned.
- i. February 12, 2018 e-mail from andy@bigredsports.com to courtney@bigredsports.com (Doc. 227-3, p. 9) The Google materials

- returned included no e-mails dated on or about February 12, 2018. This particular e-mail was not found among the materials returned.
- j. April 13, 2018 e-mail from quartneeee@gmail.com to andy@bigredsports.com (Doc. 227-3, p. 9) The Google materials returned included no e-mails dated on or about April 13, 2018. This particular e-mail was not found among the materials returned.
- 4. Although there were no responsive records related to the ten specific e-mails attached to the defendant's motion (Doc. 227-3), the records returned from Google did include a total of twelve emails, nine on 08/31/2017 and three on 09/01/2017, which were sent from Courtney Wells to various parties at bigredsports.com, normanmitsubishi.com, and sidecarsinc.com. Exhibit 13 contains the content of each of the emails from this time period and each of them included a standard signature for Courtney Wells that appeared as follows:

Courtney Wells
Comptroller
Big Red Sports / Imports
Norman Mitsubishi
Mayes Kia
405-364-4400 ext. 137
405-317-8842 cell
405-447-8248 fax

5. I also reviewed information from Google relating to the two May 2022 emails attached to the defendant's motion (Docs. 227-6 and 227-7). The materials from Google did reflect that those two e-mails were sent from courtney@bigredsports.com to cmayes11@bigredsports.com. According to the records obtained from Google, the last IP

login activity for <u>courtney@bigredsports.com</u> prior to these emails being sent was observed on April 26, 2022 from IP address 184.176.5.121. Her account appears to have remained logged in through the time the May 2022 e-mails were allegedly written. Exhibits 15, 16, 17, 18 and 19 are subscriber login reports for each of the e-mail accounts analyzed. The login to <u>courtney@bigredsports.com</u> on April 26, 2022 can be observed in Exhibit 15.

- 6. In addition to the foregoing, I did observe a number of things from the Google return regarding the e-mail addresses in question.
 - drafted March 26. 2022. someone e-mail from a. On quartneeee@gmail.com to andy@bigredsports.com with Subject line "deals", that contained the following text within the body of the email: "I told you not to email me on my bigred email about". The email signature is for Courtney Wells and includes her cellular telephone number. Exhibit 14 is a copy of that e-mail. This e-mail was found in the production related to <u>quartneee@gmail.com</u>. The time of the e-mail is 1835 UTC. The login record for andy@bigredsports.com (Ex. 16) shows a login at 1605, a few hours prior to the drafting of the e-mail and a logout at 1906, just 30 minutes after it was drafted. This particular e-mail was found in the records relating to quartneeee@gmail.com. I was unable to locate a corresponding copy of this e-mail in the production associated with andy@bigredsports.com

- b. I was unable to locate a single e-mail that had been sent from andy@bigredsports.com during any of the time periods reflected in the production.
- c. From my review of the records, it appears that most of the e-mail content from <u>chris@bigredsports.com</u> has been deleted. In the return, there were few e-mails of any kind to or from that e-mail address. While this could be attributable to a decrease in use of the account, that does not appear to be the reason as it is clear that the account was in use during the time period and there are e-mails that were sent and received that are now missing. For instance, Exhibit 20 is an e-mail chain in which an individual at Armstrong Bank (Alyssa Banks) e-mails both Courtney Wells and Chris Mayes as part of a string of communication that occurred on January 24 and 25, 2022. The individual at Armstrong Bank requested approval from Chris Mayes to release information to Courtney Wells. Mr. Mayes responded affirmatively with an e-mail back that can be seen in the chain. However, neither the e-mails to <u>chris@bigredsports.com</u> or the affirmative e-mail sent from that account were separately found in the Google records, indicating that both e-mails had been deleted or otherwise removed from the Google cloud account.
- d. Starting in or about May 9, 2022, there were a number of notifications that various e-mail accounts were accessed by unrecognized devices at or

around the time that the folder of e-mails was reportedly discovered. This included:

- i. A May 9, 2022 security alert notification sent at 8:35:19 PM to recovery email address quartneeee@gmail.com from Google reporting sign-in the linked new to account courtney@bigredsports.com by an unrecognized Windows device. This security alert was also sent to courtney@bigredsports.com. However, no record of that copy was located in the Google production, indicating that the email had been deleted or otherwise removed from the Google cloud account courtney@bigredsports.com. Subscriber information obtained from the Google production indicated that this login occurred from IP Address 184.176.5.121.
- ii. A May 10, 2022 security alert notification sent at 5:46:09 PM to quartneeee@gmail.com indicating a new sign-in on using an unrecognized Windows device for email account courtney@bigredsports.com. This email was sent to both courtney@bigredsports.com and the recovery email address quartneeee@gmail.com. However, no record of that copy was located in the Google production, indicating that the email had been deleted or otherwise removed from the Google cloud account for courtney@bigredsports.com. Account subscriber information

obtained from the Google production indicated that this login

occurred from IP Address 184.176.5.121.

e. On May 10, 2022 at 8:14:01 PM an email was sent from

courtney@bigredsports.com to andy@bigredsports.com. The subject line

of the email was "test" and the body of the email contained only the word

"test". Account subscriber information obtained from the Google

production indicated that this login occurred from IP Address

184.176.5.121.

I declare, under penalty of perjury, that the foregoing is true and correct.

Date: August 23, 2022

Jason Wildeman, Special Agent, Federal

Bureau of Investigation